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November 10, 2023

**VIA ELECTRONIC FILING**

Hon. Patrick G. Radel  
U.S. Bankruptcy Court  
Alexander Pirnie U.S. Courthouse and Federal Building  
10 Broad Street  
Utica, NY 13501

Re: *The Roman Catholic Diocese of Ogdensburg, New York,*  
Case No.: 23-60507; *The Roman Catholic Diocese of*  
*Ogdensburg, New York, et al. v. Certain Underwriters at*  
*Lloyd's London, et al.*, Adv. Pro. Case No.: 23-80013

Dear Judge Radel:

This firm, together with Parker, Hudson, Rainer & Dobbs LLP, represents Interstate Fire and Casualty Company ("Interstate") in this matter. We write on behalf of Interstate, Employers Insurance Company of Wausau (f/k/a Employers Insurance of Wausau A Mutual Company f/k/a Employers Mutual Liability Insurance Company of Wisconsin), Evanston Insurance Company, as successor-in-interest to Associated International Insurance Company, International Insurance Company, Century Indemnity Company, as successor to CCI Insurance Company, as successor to Insurance Company of North America, Granite State Insurance Company, and the London Market Insurers<sup>1</sup> (collectively, the "Insurers") in response to the Court's Order dated November

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<sup>1</sup> The London Market Insurers are defined as Certain Underwriters at Lloyd's, London, Catalina Worthing Insurance Ltd f/k/a Hartford Financial Products International (as Part VII transferee of Excess Insurance Co. Ltd. and London & Edinburgh Insurance Co. Ltd., as successor to London & Edinburgh General Insurance Co. Ltd.), RiverStone Insurance UK Limited (as successor in interest to Terra Nova Insurance Co. Ltd. and Sphere Drake Insurance Co. PLC), Yasuda Fire & Marine

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8, 2023 at ECF Doc. No. 54 which directed any Mediation Party wishing to be heard regarding the potential appointment of Roger L. Kramer as mediator to file a letter stating its position on or before November 10, 2023.

The Insurers continue to support the mediators proposed in their November 6, 2023 letter – specifically Judge NeMoyer and/or Judge Zive with Mr. Van Osselaer. The Insurers are familiar with and have prior experience in similar cases with these candidates. The Insurers do not have any prior experience with Mr. Kramer and are not aware of Mr. Kramer having experience in any bankruptcy matters.

We understand that counsel for the Committee and counsel for the Diocese have had the opportunity to speak with Mr. Kramer regarding his potential appointment. If the Court is inclined to consider Mr. Kramer over the other candidates that have been proposed, the Insurers would appreciate an opportunity to speak with Mr. Kramer as well. We reached out to Mr. Kramer's office in an attempt to do so, but have not yet had the opportunity to connect. As such, we would ask the Court for additional time to perform our due diligence and to provide the Court with our position in response to the Committee's proposal.

We thank the Court for its patience and assistance with the mediator selection process.

Respectfully submitted,

RIVKIN RADLER LLP

/s/ Siobhain P. Minarovich  
Siobhain P. Minarovich

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Insurance Co. (UK) Ltd., River Thames Insurance Company Limited (as successor in interest to Unionamerica Insurance Company Limited, which was itself the legal successor to: (i) St Paul Reinsurance Company Limited (formerly known as Mercury Reinsurance Company (UK) Limited and St Paul Fire & Marine Insurance Company (UK) Limited) and (ii) certain business of St Paul Travelers Insurance Company Limited (formerly known as St Katherine Insurance Company Limited, St Katherine Insurance Company Plc and St Paul International Insurance Company Limited), Cavello Bay Reinsurance Limited (as successor by merger to the interests of Harper Insurance Limited, formerly known as Turegum Insurance Company), and Dominion Insurance Co. Ltd. (collectively "London Market Insurers").